

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

DON LIPPERT, et al.,	)	
	)	
Plaintiffs,	)	No. 10-cv-4603
v.	)	
	)	Judge Jorge L. Alonso
JOHN BALDWIN, et al.,	)	Magistrate Judge Susan E. Cox
	)	
Defendants.	)	

**PLAINTIFFS' MOTION FOR LEAVE TO FILE UNDER SEAL**

Plaintiffs respectfully move this Court, pursuant to Local Rule 26.2, for leave to file the complete version of Plaintiffs' Proposed Findings of Fact and Conclusions of Law ("Plaintiffs' Proposed Findings") under seal, and in support state as follows:

1. Plaintiffs' Findings describe some content from a limited number of documents produced by Defendants or by their healthcare services vendor, Wexford Health Sources, Inc., which Defendants or Wexford have designated "Attorneys' Eyes Only" under the Protective Order in this case.

2. Accordingly, Plaintiffs are prohibited from filing this information in the public record.

3. Plaintiffs are simultaneously filing a redacted version of Plaintiffs' Proposed Findings in the public record.

4.

WHEREFORE, Plaintiffs request that the Court grant Plaintiffs' motion for leave to file the complete version of Plaintiffs' Proposed Findings, attached hereto as Exhibit 1, under seal.

DATED: November 16, 2018

Respectfully submitted,  
DON LIPPERT, et al.

By: /s/ Camille E. Bennett  
*One of their attorneys*

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**CERTIFICATE OF SERVICE**

The undersigned, an attorney, certifies that on November 16, 2018, she caused a copy of the above and foregoing PLAINTIFFS' MOTION FOR LEAVE TO FILE UNDER SEAL to be served on all counsel of record via the Court's electronic filing system (CM/ECF):

/s/ Camille E. Bennett